NEUMAN, WILLIAMS, ANDERSON & OLSON

77 WEST WASHINGTON STREET

CHICAGO, ILLINOIS 60602



COPY

July 2, 1984

Charles E. Quarton, Esquire N.A.P. Consumer Electronics Corp. Interstate 40 and Straw Plains Pike P. O. Box 6950 Knoxville, Tennessee 37914

Re: Magnavox v. Activision

Dear Chuck:

Enclosed herewith for execution by Magnavox is Plaintiffs' Response to Defendant's Fourth Set of Interrogatories (Nos. 193-196). Kindly see that they are appropriately executed by Magnavox and then forward the original on to Lou Etlinger at Sanders for execution by Sanders. By carbon copy of this letter we are requesting Lou to return the responses to us for filing after he has executed them.

Very truly yours,

NEUMAN, WILLIAMS, ANDERSON & OLSON

By James T. Williams

JTW/cmp

Enclosure

CC: Thomas A. Briody, Esquire Algy Tamoshunas, Esquire (w/encl) /Louis Etlinger, Esquire (w/encl) Theodore W. Anderson, Esquire

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1 2 3	McCUTCHEN, DOYLE, BROWN & ENERSEN J. Thomas Rosch Three Embarcadero Center San Francisco, CA 94111 Telephone: (415) 393-2200	
4 5 6 7 8 9	NEUMAN, WILLIAMS, ANDERSON & OLSON Theodore W. Anderson James T. Williams 77 West Washington Street Chicago, IL 60602 Telephone: (312) 346-1200 Attorneys for Plaintiffs The Magnavox Company and Sanders Associates, Inc.	
10 11	United States District Court For The Northern District Of California	
12 13	THE MAGNAVOX COMPANY, a corporation, and SANDERS ASSOCIATES, INC., a corporation,)))))))) DLAINTIFF'S RESPONSE))))) DLAINTIFF'S RESPONSE))) DLAINTIFF'S RESPONSE))) DLAINTIFF'S RESPONSE))) DLAINTIFF'S RESPONSE)))))))))))))
14	Plaintiffs,	
15	v. ACTIVISION, INC., a corporation,	
17	Defendant.)
18		
19	Plaintiffs herewith respond to defendant's interroga-	
20	tories 193-196. Plaintiffs object to each of those interroga- tories for at least the following reasons:	
22	1. Plaintiffs object to interrogatories 193-196 to the	
23	extent they are deemed to be continuing or require supplementation	
24	beyond the requirements of Rule 26(e), F.R.Civ.P.	
25		
26		
27		
28	8	PLAINTIFFS' RESPONSE TO DEFENDANT'S FOURTH SET OF INTERROGATORIES (NOS. 193-196)
2. 2.		

2. Plaintiffs object to the definitions of "Magnavox"
 and "Sanders" included in the introduction to interrogatories
 193-196 to the extent those definitions and the interrogatories
 making use of them attempt to impose any obligation on plaintiffs
 to supply information beyond that required by the Federal Rules of
 Civil Procedure.

7 3. Plaintiffs object to interrogatories 193-196 as
8 having been served upon them less than thirty (30) days prior to
9 the May 31, 1984 discovery close date.

However, in order to advance the progress of this action and without waiver of any of the within-stated objections, plaintiffs further respond to defendant's interrogatories 193-196 in the following. The answers supplied are based on information obtained from those employees of plaintiff Sanders believed to have knowledge of the relevant facts.

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17 || INTERROGATORY NO. 193

18 Identify all employees and/or other personnel of Sanders 19 Associates who between January 1, 1964 and May 27, 1969 visited 20 the NASA facility now known as the NASA-Johnson Space Center at 21 Houston, Texas.

RESPONSE:

Plaintiffs object to interrogatories 193-196 as requesting information which is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Without waiver of this

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PLAINTIFFS' RESPONSE TO DEFENDANT'S FOURTH SET OF INTERRORAGTORIES (NOS. 193-196)

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l	RESPONSE:	
2	No response required in light of the responses to	
3	interrogatories 193-195.	
4		
5	, 1984	
6	The Magnavox Company	
7	Subscribed and sworn to before me this day of, 1984, in	
8	· ·	
9	Notary Public	
10	My Commission Expires:	
11	, 1984	
12	Sanders Associates, Inc.	
13	Subscribed and sworn to before me this day of, 1984,	
14	in	
15	Notary Public	
16	My Commission Expires:	
17		
18	The foregoing objections and contentions are asserted or	
19	stated on behalf of plaintiffs by:	
20		
21		
22	Theodore W. Anderson James T. Williams	
23	NEUMAN, WILLIAMS, ANDERSON & OLSON Attorneys for The Magnavox Company	
24	and Sanders Associates, Inc.	
25	77 West Washington Street Chicago, Illinois 60602	
26	(312) 346-1200	
27	-5-	
28	PLAINTIFFS' RESPONSE TO DEFENDANT'S FOURTH SET OF INTERRORAGTORIES (NOS. 193-196)	

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